

manatt

**Brian Turoff**  
Manatt, Phelps & Phillips, LLP  
Direct Dial: (212) 704-1983  
E-mail: BTuroff@manatt.com

July 6, 2020

**VIA ECF**

Hon. Vera M. Scanlon  
United States Magistrate Judge  
United States District Court  
225 Cadman Plaza  
Brooklyn, NY 11201

**Re: Roque Lopez, et al. v. Pronto Pizza 02 LLC, et al.**  
*Case No. 18-cv-05639*

Dear Judge Scanlon:

We are counsel to Defendants Pronto Pizza 02 LLC, Pronto Pizza 03 LLC, Kash Miftari, Dashnor Miftari, and Besnik Steve Miftari (collectively, “Defendants”). Defendants, together with Plaintiff, jointly submit this letter to respectfully request that the deadline by which the parties may complete mediation be extended to September 30, 2020.

By way of background, prior to the pandemic, the parties selected mediator Ronald Kreismann and scheduled a mediation for April 2, 2020. On March 15, 2020, the parties received an email from Mr. Kreismann stating that he had “been advised by the Eastern District ADR administrator that all Mediations scheduled to take place in the next 30 days [which included our April 2, 2020 mediation date] are to be adjourned subject to further guidance by the court.” Thereafter, the parties proactively sought an extension of the mediation deadline to June 30, 2020, which Your Honor granted.

However, the parties have been unable to prepare for and complete mediation due to the impact of pandemic, namely the impact that New York State Executive Order No. 202.8 – which, as the Court is aware, mandated that all non-essential businesses reduce their in-person workforces by 100% – had on counsel for the parties and the profound impact the pandemic had on Defendants’ business operations. As New York has now entered Phase Two of its reopening plan, the parties are actively seeking to reschedule the mediation.

Due to previously scheduled mediations in separate matters and pre-planned vacations, the parties’ earliest mutual availability is in September. Accordingly, the parties respectfully request that the deadline by which to complete mediation be extended until September 30, 2020. This is the parties’ second request for an extension of the mediation deadline.

manatt

Hon. Vera M. Scanlon  
July 6, 2020  
Page 2

We thank the Court for its time and attention to this matter.

Respectfully Submitted,



Brian J. Turoff

cc: All Counsel of Record via Email